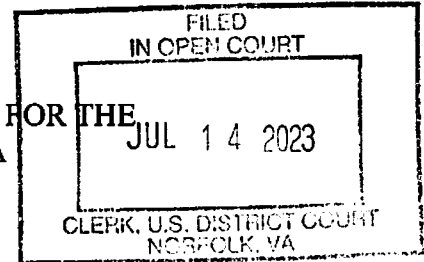


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Norfolk Norfolk Division



UNITED STATES OF AMERICA

v.

LATEYA CONLEY,

Defendant.

Criminal No. 2:22CR147-04

STATEMENT OF FACTS

The United States and the defendant, LATEYA CONLEY ("L. CONLEY") stipulate that the allegations in Count One of the Criminal Information and the following facts are true and correct, and that had the matter gone to trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and competent evidence:

1. From approximately January 2020 and continuing thereafter up to and including November 8, 2022, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, L. CONLEY knowingly and intentionally laundered money for a Continuing Criminal Enterprise (CCE) that trafficked in marijuana and psilocybin. The CCE, which included multiple co-conspirators, including CORTNEY ALLEN CONLEY ("C. CONLEY"), a/k/a "KO," RASHAUN MARCQUEZ JOHNSON, a/k/a "Shaun," ("JOHNSON"), DAVIAN MARCELIS JENKINS, a/k/a "DJ" ("JENKINS"), JASMINE DENEEN CUFFEE, a/k/a "Jas" ("CUFFEE"), COREY MELIC BLACKWELL, a/k/a "Blick" ("BLACKWELL"), JAVAID AKHTAR REED, a/k/a "Vay" ("REED"), KASHEIM BRYANT ("BRYANT"), KYRON SPELLER, a/k/a "Spazz" ("SPELLER"), TERRANCE SPENCER ALEXANDER, a/k/a "T-Money" ("ALEXANDER"); and AARON HUNTER, a/k/a "ASAP" ("HUNTER"), conspired to distribute and possess with the intent to distribute 100 kilograms or more of a mixture and substance containing a detectable

AD  
m-  
JC

amount of marijuana and a mixture and substance containing a detectable amount of psilocybin.

Co-conspirators generated substantial proceeds from the sale of controlled substances.

2. Psilocybin is a constituent of "Magic mushrooms" and was sold by the co-conspirators as "Magic mushrooms" and edibles. Marijuana is a Schedule I controlled substance. Psilocybin is a Schedule I controlled substance.

3. The CCE received quantities of marijuana and psilocybin from a source of supply in California and Oregon, at times via the United States Postal Service.

4. It was part of the conspiracy that the defendants and co-conspirators would and did play different roles in the conspiracy, taking upon themselves different tasks and participating in the affairs of the conspiracy through various criminal acts. Some of the roles which the defendants and co-conspirators assumed and carried out included, among others, organizer, manager, distributor, packager, advertiser, supplier, and collector. C. CONLEY employed couriers, security, doormen, advertisers, and lower-level retail controlled substance dealers as part of the C. CONLEY DTO. C. CONLEY acted as an organizer, supervisor and manager of the C. CONLEY DTO. JOHNSON acted as security and doorman at "popup" dispensary locations, which would change and "popup" at new locations during the course of the conspiracy. As a doorman, JOHNSON controlled drug customers' access and entry to the "popup" dispensaries. JOHNSON also utilized a cellular phone to advertise controlled substances to customers. JENKINS acted as security and engaged in drug sales at "popup" locations. L. CONLEY handled the finances and proceeds from the illegal sales of controlled substances on behalf of the conspiracy, ~~including~~ ~~as a fugitive from law enforcement, with the C. CONLEY DTO, and as a fugitive from law enforcement.~~ L. CONLEY <sup>JEA mv</sup> further assisted C. CONLEY when he was a fugitive from law enforcement after the May 13, 2022 double homicide at the Wintercress Way "popup" location. CUFFEE sought out and rented

apartments that served as “popup” locations for the conspiracy. CUFFEE further assisted C. CONLEY when he was a fugitive from law enforcement after the May 13, 2022 double homicide at the Wintercress Way “popup” location. CUFFEE also received packages sent via USPS containing controlled substances on behalf of C. CONLEY. REED acted as a manager and security for various popup locations. SPELLER acted as security for various “popup” locations and helped establish the Wintercress Way “popup” shop. SPELLER also assisted C. CONLEY when he was a fugitive from law enforcement by renting a vehicle and driving C. CONLEY to Georgia after the May 13, 2022 double homicide at the Wintercress Way “popup” location. ALEXANDER acted as a doorman and security for the C. CONLEY DTO. BLACKWELL acted as a partner to C. CONLEY in 2020 and 2021 at the Providence Road “popup” location, delivered marijuana belonging to C. CONLEY to an unindicted coconspirator, and sent the surveillance videos that captured the May 13, 2022 double homicide at the Wintercress Way “popup” shop to C. CONLEY in June 2022. BLACKWELL assisted C. CONLEY in reestablishing a “popup” shop utilizing multiple Airbnb locations after the May 13, 2022 double homicide at the Wintercress Way “popup” shop. HUNTER worked as security and in sales of controlled substances for C. CONLEY.

5. Members of the CCE established makeshift “popup” marijuana and psilocybin dispensaries at various locations throughout Hampton Roads, including apartments on Providence Road and Wintercress Way in Chesapeake, Virginia. The locations often moved or “popup” at new locations to avoid detection by law enforcement, would be robbers, and burglaries. Codefendants RASHAUN MARCQUEZ JOHNSON (“JOHNSON”) and TERRANCE SPENCER ALEXANDER (“ALEXANDER”) acted as a doormen and security for the “popup” dispensaries. The apartments at Providence Road and Wintercress Way were set up as a makeshift dispensaries for the sale and distribution of controlled substances, including marijuana and



psilocybin. The bedroom of the apartment displayed OXO POP up containers with marijuana plant material labeled with the strain name and quantity pricing, psilocybin mushrooms, THC concentrate carts and edible substances. The pricing displayed common sale increments for marijuana, including 3.5 Grams, ¼ ounce, ½ ounce, and ounce. The bedroom also displayed multiple dry erase whiteboards labeled with marijuana prices, and Cash App<sup>1</sup> Handles. In addition, multiple scannable URL codes were displayed for electronic transfer of money. The location was also equipped with a Square<sup>2</sup> iPad credit card scanner dock to receive payment from customers and a commercial money counter. L. CONLEY visited the Wintercress “popup” dispensary on more than one occasions and received drug proceeds from C. CONLEY which she then spent.

6. Coconspirators within the CCE advertised the dispensaries, including the Wintercress Way “popup” dispensary, through social media platforms to obtain customers, including through the application Telegram<sup>3</sup>. Co-conspirators were armed throughout the course of the conspiracy to protect the controlled substances and proceeds from the sale of controlled substances at the “popup” dispensary locations. The Wintercress Way “popup” dispensary was also equipped with multiple interior-mounted Ring cameras, which were positioned to monitor points of entry and drug sales where cash proceeds were dropped in a secure drop box following transactions.

7. On May 13, 2022, two individuals attempted to rob the Wintercress Way “popup” dispensary. That day, JOHNSON was working security, checking the peep hole as customers

---

<sup>1</sup> Cash App is a mobile payment service available in the United States and the United Kingdom that allows users to transfer money to one another using a mobile phone app.

<sup>2</sup> Square is a financial services platform developed by Block, Inc. Square is a financial services platform aimed at small and medium businesses that allows them to accept credit card payments and use tablet computers as payment registers for a point-of-sale system.

<sup>3</sup> Telegram is a cloud-based instant messaging service. The service also provides optional end-to-end encrypted chats and video calling, VoIP, file sharing and several other features.

came to the door, and granting entrance to customers. Codefendant DAVIAN MARCELIS JENKINS ("JENKINS") was collecting money and distributing marijuana and psilocybin to customers, and CORTNEY CONLEY ("C. CONLEY") was managing the "popup" dispensary as the head of the CCE.

8. At approximately 2:50 p.m. on May 13, 2022, two armed subjects wearing ski masks displayed handguns and forced their way into the Wintercress Way "popup" dispensary. As the two subjects entered the residence, they were met with armed resistance from JOHNSON and C. CONLEY. C. CONLEY was armed with a .45 caliber handgun which he brandished and discharged at the two subjects. JOHNSON was armed with a Glock 9mm semi-automatic pistol, which he brandished and discharged at the two subjects. Gunfire was exchanged with rounds entering neighboring residences. One of the subjects fell dying in the foyer of the residence and the second subject was repeatedly shot with a large caliber handgun multiple times, immobilizing his arms as he attempted to reach for the door handle to flee the residence. Both subjects were left dying in the foyer blocking the front door of the apartment. JENKINS took a firearm from one of the subjects and pistol-whipped the subject as he lay dying in the foyer. JOHNSON, C. CONLEY and JENKINS fled the apartment. L. CONLEY was not present at the Wintercress "popup" dispensary during the shootout, and she learned of the shootout afterwards.

9. Following the shooting, the coconspirators inside the residence, including C. CONLEY, JOHNSON, and JENKINS, began to pack up large duffle bags full of controlled substances, including marijuana and psilocybin, and money and departed the residence through rear windows.

10. C. CONLEY fled from law enforcement until he was apprehended on November 8, 2022. C. CONLEY later returned to the Hampton Roads region to reestablish a "popup"

dispensary in Virginia Beach, at an address located on Newtown Arch. CUFFEE assisted C. CONLEY while he was on the run with renting the Newtown Arch apartment. Other codefendants, including SPELLER and BRYANT, assisted C. CONLEY in establishing the Newtown Arch. “popup” dispensary.

11. On November 8, 2022, law enforcement conducted surveillance at the Newtown Arch “popup” dispensary. The investigative team observed BRYANT arrive at the location. The investigative team further observed multiple suspected customers coming and going from the “popup” dispensary with bags of suspected marijuana. Members of the investigative team ordered C. CONLEY and BRYANT to come out of the apartment. C. CONLEY attempted to flee by jumping from a window and was apprehended by investigators. BRYANT ignored commands from law enforcement and remained inside the residence for an extended period of time. After negotiations, BRYANT exited the apartment. A search warrant was secured for the residence. BRYANT was detained pending the execution of the search warrant and found in possession of two cellular devices and a black leather gun holster.

12. The “popup” dispensary located at Newtown Arch was a two-bedroom, one bathroom apartment on the second floor of a multifamily structure. The apartment was purposed for the sale and distribution of controlled substances with folding tables set up in the bedrooms, consistent with the setup of the Wintercress “popup” dispensary. Quantities of marijuana and psilocybin were recovered from the “popup” dispensary. Law enforcement also recovered a Glock 9mm semi-automatic pistol and a Glock 23 .40 caliber semi-automatic pistol underneath couch cushions inside the “popup” dispensary. BRYANT had previously brought both Glock firearms into the residence to protect the controlled substances and proceeds.

13. C. CONLEY deposited drug proceeds into multiple bank accounts, some of which were in the name of L. CONLEY, including an account ending in x2047 at Bank of America, an account ending in x3292 at JPMorgan Chase, an account ending in x5062 at Wells Fargo, an account ending in x3179 at Navy Federal Credit Union, an account ending in x4208 at Navy Federal Credit Union, and an account ending in x3132 at Navy Federal Credit Union.

14. During the course of the CCE, L. CONLEY facilitated moving approximately \$363,382.68 in drug proceeds from CashApp, Apple Cash, Paypal, Zelle into bank accounts she opened at Wells Fargo, Bank of America, JPMorgan, and Navy Federal Credit Union. From approximately January 2020 through July 2022, L. CONLEY withdrew hundreds of thousands of dollars from these accounts via fund transfers, electronic bill-pay or cash withdrawals. L. CONLEY then transferred those substantial proceeds out of those accounts into cash, CashApp, investments/Crypto Accounts, Credit Card payments, Rent, Mortgage payments and auto loan payments.

15. Chesapeake is located within the Eastern District of Virginia.

16. The parties further stipulate and agree that the defendant's base offense level (BOL) is no greater than a level 24.

17. The acts taken by the defendant, LATEYA CONLEY, in furtherance of the offenses charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law. The defendant acknowledges that the foregoing statement of facts is a partial summary of the case and does not describe all of the defendant's conduct relating to the offenses charged in this case, nor does it identify all of the persons with whom the defendant may have engaged in illegal activities.

Respectfully submitted,

Jessica D. Aber  
United States Attorney

By:

  
Megan M. Montoya  
Assistant United States Attorney

b

my  
JC

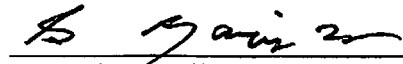


*UNITED STATES v. LATEYA CONLEY*, 2:22cr147-04

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, LATEYA CONLEY, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
LATEYA CONLEY  
Defendant

I am counsel for LATEYA CONLEY. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.

  
S. Mario Lorello, Esq.  
Attorney for LATEYA CONLEY